

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

LAUREN KESTERSON  Plaintiff,  vs.  KENT STATE UNIVERSITY, <i>et al.</i>  Defendants.	Case No. 5:16-cv-00298  Judge Sara Lioi  Magistrate Judge Kathleen B. Burke
<b>MOTION TO VACATE DEADLINES AND REQUEST FOR TELEPHONE STATUS CONFERENCE (UNOPPOSED BY TWO OF THE THREE DEFENDANTS)</b>	

Plaintiff Lauren Kesterson respectfully requests that the Court vacate the case deadlines set forth in Doc. No. 41 at 602–07. As reported in the most-recent joint status report, Plaintiff’s counsel conferred with all defense counsel regarding this motion’s subject matter. Defendants Karen Linder and Eric Oakley do not oppose this motion.

The trial-related calendar events in this matter begin on September 28, 2018 with the deadline for the meeting of the parties to determine any stipulations relative to facts or issues, the deadline for filing all trial-related motions, and the deadline for filing proposed *voir dire* questions. Substantial work must be completed in the intervening weeks to meet these deadlines. There are additional deadlines in October before the final pre-trial scheduled for October 12, 2018, and then throughout November in advance of the trial scheduled for two-week standby starting on December 3, 2018.

All three defendants have pending summary-judgment motions. Doc. Nos. 161, 164, and 166. The Court’s rulings on those motions will have a significant impact on trial

preparation. The Court's rulings could affect the status of certain parties and could narrow or expand the need for some factual stipulations. Given the qualified-immunity issue argued by Defendant Linder, there may be an interlocutory appeal that would delay the trial calendar. Further, some trial-related motions may be made moot, depending upon what issues of law the Court decides.

Ms. Kesterson seeks adequate time after the Court's rulings on Defendants' Rule 56 motions to permit appropriate review and analysis of those rulings and thus facilitate an orderly trial-preparation process. Accordingly, to conserve party resources and prevent unnecessary or duplicative legal work, Ms. Kesterson respectfully requests that the Court vacate the existing trial deadlines and reset those dates following the Court's rulings on the pending Rule 56 motions and resolution of any interlocutory appeal.

Finally, Ms. Kesterson requests that the Court set a telephonic status conference to discuss trial preparation and deadlines.

Respectfully submitted,

THE CHANDRA LAW FIRM LLC

/s/ Ashlie Case Sletvold

Subodh Chandra (0069233)

Ashlie Case Sletvold (0079477)

Donald Screen (0082884)

The Chandra Law Building

1265 W. 6<sup>th</sup> St., Suite 400

Cleveland, OH 44113-1326

216.578.1700 Phone

216.578.1800 Fax

Subodh.Chandra@ChandraLaw.com

Ashlie.Sletvold@ChandraLaw.com

Donald.Screen@ChandraLaw.com

*Counsel for Plaintiff Lauren Kesterson*

**Certificate of service**

I certify that this document was filed using the Court's ECF system, which will send notification to all counsel of record.

/s/ Ashlie Case Sletvold

One of the attorneys for Plaintiff Lauren Kesterson